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12 LN MANAGEMENT LLC SERIES 31
13 RUE MEDITERRA

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

LAKE LAS VEGAS MASTER TRUST,)
vs.)
UNITED STATES INTERNAL REVENUE)
SERVICE; Z'S a defaulted Nevada Corporation;)
and DOES 1 through 10,)
Defendants.)
LN MANAGEMENT LLC SERIES 31 RUE)
MEDITERRA,)
v.)
UNITED STATES INTERNAL REVENUE)
SERVICE; Z'S, a defaulted Nevada)
Corporation; and DOES 1 through 10, inclusive,)
Defendants.)

Plaintiff,))
Case No. 2:14-cv-00435-JAD-NJK
consolidated with:
Case No. 2:14-cv-00658-JAD-NJK
ECF Nos. 117, 118

STIPULATION TO EXTEND TIME TO RESPOND

TO MOTION FOR DISTRIBUTION OF FUNDS

COMES NOW Plaintiff, LN MANAGEMENT LLC SERIES 31 RUE MEDITERRA (“LN”) and Defendant UNITED STATES INTERNAL REVENUE SERVICE (“IRS”), by and

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1 through their undersigned counsel, and hereby stipulate and agree as follows:

2 1. On December 13, 2018, IRS filed a Motion for Distribution of Funds herein [ECF
3 #116]. LN's Response to said Motion was due on or before December 27, 2018.

4 2. LN's counsel has requested an extension of time in which to respond to the
5 subject Motion primarily as a result of the intervening holidays and family
6 obligations associated therewith. In addition, counsel has had a large number of
7 other work obligations. Moreover the parties desire to explore whether an
8 amicable resolution of the Motion may be possible.

9 3. Although the request for an extension was made prior to the deadline, the instant
10 stipulation is being submitted after the deadline because counsel for the IRS has
11 been affected by the ongoing partial government shut down. As a result, counsel
12 was not able to immediately respond to the request.

13 4. LN shall have an extension of time to file its Response to the Motion for
14 Distribution of Funds until January 18, 2019.

15 5. This Stipulation is made in good faith and not for purposes of delay.

16 Dated this 26th day of December, 2018.

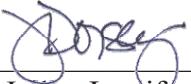
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18
19 /s/ Timothy E. Rhoda
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U.S. DEPARTMENT OF JUSTICE

23
24 /s/ Virginia Cronan Lowe
25 VIRGINIA CRONAN LOWE
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 686
Washington, DC 20044
26 *Attorneys for Defendant*
27 UNITED STATES INTERNAL
REVENUE SERVICE

28
29 IT IS SO ORDERED.

30
31 
32 U.S. District Judge Jennifer A. Dorsey
33 Dated: January 3, 2019